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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VERONICA THERESA RAMIREZ,

Plaintiff,

vs.

MARTIN O'MALLEY,  
Commissioner of Social Security,

Defendant.

Case 2:23-cv-01885-EJY

UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(*FIRST REQUEST*)

Defendant, the Commissioner of Social Security, respectfully requests an extension of 30 days in which to respond to Plaintiff's Brief (ECF No. 14), filed on March 28, 2024, changing the date on which Defendant's response is due to from April 29, 2024, to May 29, 2024. This is Defendant's first request for an extension to respond to Plaintiff's motion. Counsel for Defendant conferred with a representative for counsel for Plaintiff and confirmed that Plaintiff has no objection to this request.

Defendant makes this request in good faith and for good cause. I request this extension in order to further consider the 1354-page administrative record in light of the two issues raised in Plaintiff's motion. While I have been diligently trying to complete the review of this case file, I additionally have had several briefs due in recent days in other district courts. In the next month, I

1 have nine more briefs due in various district courts of the Ninth Circuit, including this one.  
2 Accordingly, I ask the Court for more time so that I can properly represent the Commissioner in  
3 this and my other matters.

4 For these reasons, the Commissioner respectfully requests that the Court grant this motion  
5 for an extension of 30 days for Defendant to respond to Plaintiff's Opening Brief.

6 DATED April 29, 2024.

Respectfully submitted,

7 JASON M. FRIERSON  
8 United States Attorney

9 s/ Julie A.K. Cummings  
10 JULIE A.K. CUMMINGS  
11 Special Assistant United States Attorney  
12 Office of Program Litigation, Office 7

13 Attorneys for Defendant

14 IT IS SO ORDERED:

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16   
17 HON. ELAYNA J. YOUCHAH  
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: April 30, 2024  
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